

KIRSTEN A. MILTON, ESQ.
Nevada State Bar No. 14401
JACKSON LEWIS P.C.
300 S. Fourth Street, Suite 900
Las Vegas, Nevada 89101
Tel: (702) 921-2460
Fax: (702) 921-2461
Email: Kirsten.Milton@jacksonlewis.com

*Attorneys for Defendant
Nevada Restaurant Services, Inc.*

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

RANDY SIMMS, an Individual;

Plaintiff,

VS.

NEVADA RESTAURANT SERVICES, INC.,
a Nevada Corporation; DOES I-X; ROE
CORPORATION I-X

Defendants.

Case No.: 2:24-cv-01182-MDC

**STIPULATION AND ORDER TO
EXTEND THE DEADLINE FOR FILING
THE STIPULATION TO DISMISS THE
CASE WITH PREJUDICE**

Defendant Nevada Restaurant Services, Inc. (“Defendant”), by and through its counsel, and Plaintiff Randy Simms (“Plaintiff”) by and through counsel (together, the “Parties”), hereby stipulate and agree as follows:

1. On December 2, 2024, the Parties participated in an Early Neutral Evaluation (“ENE”) via videoconference before Judge Weksler. (ECF No. 22.)

2. During the ENE, the Parties agreed to settle the case. *Id.*
3. A stipulation dismissing the case with prejudice is currently due on January 31,

2025. *Id.*

4. Since the ENE, the Parties have exchanged drafts of the Settlement General Release Agreement (the “Agreement”), but need an additional 21 days to finalize the Agreement.

1 5. As such, the Parties stipulate and respectfully request an additional 21 days, through
2 and including February 21, 2025 to file a stipulation dismissing the case with prejudice.

3 6. This Stipulation is made in good faith and not for the purpose of delay. No prior
4 request to extend the deadline to file a stipulation to dismiss the case has been made.

5 Dated this 31st day of January 2025.

6 NEVADA RESTAURANT SERVICES, INC. RANDY SIMMS

7 */s/ Kirsten A. Milton*
8 Kirsten A. Milton, Bar #14401
9 Jackson Lewis P.C.
10 300 S. Fourth Street, Suite 900
11 Las Vegas, Nevada 89101

12 *Attorneys for Defendant*

13 */s/ Michael Arata*
14 Michael Arata, Bar #11902
15 HKM Employment Attorneys LLP
16 101 Convention Center Dr., Suite 600
17 Las Vegas, Nevada 89109

18 *Attorneys for Plaintiff*

19 **IT IS SO ORDERED.**

20 _____
21 _____
22 _____
23 _____
24 _____
25 _____
26 _____
27 _____
28 _____

29 _____
30 _____
31 _____
32 _____
33 _____
34 _____
35 _____
36 _____
37 _____
38 _____
39 _____
40 _____
41 _____
42 _____
43 _____
44 _____
45 _____
46 _____
47 _____
48 _____
49 _____
50 _____
51 _____
52 _____
53 _____
54 _____
55 _____
56 _____
57 _____
58 _____
59 _____
60 _____
61 _____
62 _____
63 _____
64 _____
65 _____
66 _____
67 _____
68 _____
69 _____
70 _____
71 _____
72 _____
73 _____
74 _____
75 _____
76 _____
77 _____
78 _____
79 _____
80 _____
81 _____
82 _____
83 _____
84 _____
85 _____
86 _____
87 _____
88 _____
89 _____
90 _____
91 _____
92 _____
93 _____
94 _____
95 _____
96 _____
97 _____
98 _____
99 _____
100 _____
101 _____
102 _____
103 _____
104 _____
105 _____
106 _____
107 _____
108 _____
109 _____
110 _____
111 _____
112 _____
113 _____
114 _____
115 _____
116 _____
117 _____
118 _____
119 _____
120 _____
121 _____
122 _____
123 _____
124 _____
125 _____
126 _____
127 _____
128 _____
129 _____
130 _____
131 _____
132 _____
133 _____
134 _____
135 _____
136 _____
137 _____
138 _____
139 _____
140 _____
141 _____
142 _____
143 _____
144 _____
145 _____
146 _____
147 _____
148 _____
149 _____
150 _____
151 _____
152 _____
153 _____
154 _____
155 _____
156 _____
157 _____
158 _____
159 _____
160 _____
161 _____
162 _____
163 _____
164 _____
165 _____
166 _____
167 _____
168 _____
169 _____
170 _____
171 _____
172 _____
173 _____
174 _____
175 _____
176 _____
177 _____
178 _____
179 _____
180 _____
181 _____
182 _____
183 _____
184 _____
185 _____
186 _____
187 _____
188 _____
189 _____
190 _____
191 _____
192 _____
193 _____
194 _____
195 _____
196 _____
197 _____
198 _____
199 _____
200 _____
201 _____
202 _____
203 _____
204 _____
205 _____
206 _____
207 _____
208 _____
209 _____
210 _____
211 _____
212 _____
213 _____
214 _____
215 _____
216 _____
217 _____
218 _____
219 _____
220 _____
221 _____
222 _____
223 _____
224 _____
225 _____
226 _____
227 _____
228 _____
229 _____
230 _____
231 _____
232 _____
233 _____
234 _____
235 _____
236 _____
237 _____
238 _____
239 _____
240 _____
241 _____
242 _____
243 _____
244 _____
245 _____
246 _____
247 _____
248 _____
249 _____
250 _____
251 _____
252 _____
253 _____
254 _____
255 _____
256 _____
257 _____
258 _____
259 _____
260 _____
261 _____
262 _____
263 _____
264 _____
265 _____
266 _____
267 _____
268 _____
269 _____
270 _____
271 _____
272 _____
273 _____
274 _____
275 _____
276 _____
277 _____
278 _____
279 _____
280 _____
281 _____
282 _____
283 _____
284 _____
285 _____
286 _____
287 _____
288 _____
289 _____
290 _____
291 _____
292 _____
293 _____
294 _____
295 _____
296 _____
297 _____
298 _____
299 _____
300 _____
301 _____
302 _____
303 _____
304 _____
305 _____
306 _____
307 _____
308 _____
309 _____
310 _____
311 _____
312 _____
313 _____
314 _____
315 _____
316 _____
317 _____
318 _____
319 _____
320 _____
321 _____
322 _____
323 _____
324 _____
325 _____
326 _____
327 _____
328 _____
329 _____
330 _____
331 _____
332 _____
333 _____
334 _____
335 _____
336 _____
337 _____
338 _____
339 _____
340 _____
341 _____
342 _____
343 _____
344 _____
345 _____
346 _____
347 _____
348 _____
349 _____
350 _____
351 _____
352 _____
353 _____
354 _____
355 _____
356 _____
357 _____
358 _____
359 _____
360 _____
361 _____
362 _____
363 _____
364 _____
365 _____
366 _____
367 _____
368 _____
369 _____
370 _____
371 _____
372 _____
373 _____
374 _____
375 _____
376 _____
377 _____
378 _____
379 _____
380 _____
381 _____
382 _____
383 _____
384 _____
385 _____
386 _____
387 _____
388 _____
389 _____
390 _____
391 _____
392 _____
393 _____
394 _____
395 _____
396 _____
397 _____
398 _____
399 _____
400 _____
401 _____
402 _____
403 _____
404 _____
405 _____
406 _____
407 _____
408 _____
409 _____
410 _____
411 _____
412 _____
413 _____
414 _____
415 _____
416 _____
417 _____
418 _____
419 _____
420 _____
421 _____
422 _____
423 _____
424 _____
425 _____
426 _____
427 _____
428 _____
429 _____
430 _____
431 _____
432 _____
433 _____
434 _____
435 _____
436 _____
437 _____
438 _____
439 _____
440 _____
441 _____
442 _____
443 _____
444 _____
445 _____
446 _____
447 _____
448 _____
449 _____
450 _____
451 _____
452 _____
453 _____
454 _____
455 _____
456 _____
457 _____
458 _____
459 _____
460 _____
461 _____
462 _____
463 _____
464 _____
465 _____
466 _____
467 _____
468 _____
469 _____
470 _____
471 _____
472 _____
473 _____
474 _____
475 _____
476 _____
477 _____
478 _____
479 _____
480 _____
481 _____
482 _____
483 _____
484 _____
485 _____
486 _____
487 _____
488 _____
489 _____
490 _____
491 _____
492 _____
493 _____
494 _____
495 _____
496 _____
497 _____
498 _____
499 _____
500 _____
501 _____
502 _____
503 _____
504 _____
505 _____
506 _____
507 _____
508 _____
509 _____
510 _____
511 _____
512 _____
513 _____
514 _____
515 _____
516 _____
517 _____
518 _____
519 _____
520 _____
521 _____
522 _____
523 _____
524 _____
525 _____
526 _____
527 _____
528 _____
529 _____
530 _____
531 _____
532 _____
533 _____
534 _____
535 _____
536 _____
537 _____
538 _____
539 _____
540 _____
541 _____
542 _____
543 _____
544 _____
545 _____
546 _____
547 _____
548 _____
549 _____
550 _____
551 _____
552 _____
553 _____
554 _____
555 _____
556 _____
557 _____
558 _____
559 _____
560 _____
561 _____
562 _____
563 _____
564 _____
565 _____
566 _____
567 _____
568 _____
569 _____
570 _____
571 _____
572 _____
573 _____
574 _____
575 _____
576 _____
577 _____
578 _____
579 _____
580 _____
581 _____
582 _____
583 _____
584 _____
585 _____
586 _____
587 _____
588 _____
589 _____
590 _____
591 _____
592 _____
593 _____
594 _____
595 _____
596 _____
597 _____
598 _____
599 _____
600 _____
601 _____
602 _____
603 _____
604 _____
605 _____
606 _____
607 _____
608 _____
609 _____
610 _____
611 _____
612 _____
613 _____
614 _____
615 _____
616 _____
617 _____
618 _____
619 _____
620 _____
621 _____
622 _____
623 _____
624 _____
625 _____
626 _____
627 _____
628 _____
629 _____
630 _____
631 _____
632 _____
633 _____
634 _____
635 _____
636 _____
637 _____
638 _____
639 _____
640 _____
641 _____
642 _____
643 _____
644 _____
645 _____
646 _____
647 _____
648 _____
649 _____
650 _____
651 _____
652 _____
653 _____
654 _____
655 _____
656 _____
657 _____
658 _____
659 _____
660 _____
661 _____
662 _____
663 _____
664 _____
665 _____
666 _____
667 _____
668 _____
669 _____
670 _____
671 _____
672 _____
673 _____
674 _____
675 _____
676 _____
677 _____
678 _____
679 _____
680 _____
681 _____
682 _____
683 _____
684 _____
685 _____
686 _____
687 _____
688 _____
689 _____
690 _____
691 _____
692 _____
693 _____
694 _____
695 _____
696 _____
697 _____
698 _____
699 _____
700 _____
701 _____
702 _____
703 _____
704 _____
705 _____
706 _____
707 _____
708 _____
709 _____
710 _____
711 _____
712 _____
713 _____
714 _____
715 _____
716 _____
717 _____
718 _____
719 _____
720 _____
721 _____
722 _____
723 _____
724 _____
725 _____
726 _____
727 _____
728 _____
729 _____
730 _____
731 _____
732 _____
733 _____
734 _____
735 _____
736 _____
737 _____
738 _____
739 _____
740 _____
741 _____
742 _____
743 _____
744 _____
745 _____
746 _____
747 _____
748 _____
749 _____
750 _____
751 _____
752 _____
753 _____
754 _____
755 _____
756 _____
757 _____
758 _____
759 _____
760 _____
761 _____
762 _____
763 _____
764 _____
765 _____
766 _____
767 _____
768 _____
769 _____
770 _____
771 _____
772 _____
773 _____
774 _____
775 _____
776 _____
777 _____
778 _____
779 _____
780 _____
781 _____
782 _____
783 _____
784 _____
785 _____
786 _____
787 _____
788 _____
789 _____
790 _____
791 _____
792 _____
793 _____
794 _____
795 _____
796 _____
797 _____
798 _____
799 _____
800 _____
801 _____
802 _____
803 _____
804 _____
805 _____
806 _____
807 _____
808 _____
809 _____
810 _____
811 _____
812 _____
813 _____
814 _____
815 _____
816 _____
817 _____
818 _____
819 _____
820 _____
821 _____
822 _____
823 _____
824 _____
825 _____
826 _____
827 _____
828 _____
829 _____
830 _____
831 _____
832 _____
833 _____
834 _____
835 _____
836 _____
837 _____
838 _____
839 _____
840 _____
841 _____
842 _____
843 _____
844 _____
845 _____
846 _____
847 _____
848 _____
849 _____
850 _____
851 _____
852 _____
853 _____
854 _____
855 _____
856 _____
857 _____
858 _____
859 _____
860 _____
861 _____
862 _____
863 _____
864 _____
865 _____
866 _____
867 _____
868 _____
869 _____
870 _____
871 _____
872 _____
873 _____
874 _____
875 _____
876 _____
877 _____
878 _____
879 _____
880 _____
881 _____
882 _____
883 _____
884 _____
885 _____
886 _____
887 _____
888 _____
889 _____
890 _____
891 _____
892 _____
893 _____
894 _____
895 _____
896 _____
897 _____
898 _____
899 _____
900 _____
901 _____
902 _____
903 _____
904 _____
905 _____
906 _____
907 _____
908 _____
909 _____
910 _____
911 _____
912 _____
913 _____
914 _____
915 _____
916 _____
917 _____
918 _____
919 _____
920 _____
921 _____
922 _____
923 _____
924 _____
925 _____
926 _____
927 _____
928 _____
929 _____
930 _____
931 _____
932 _____
933 _____
934 _____
935 _____
936 _____
937 _____
938 _____
939 _____
940 _____
941 _____
942 _____
943 _____
944 _____
945 _____
946 _____
947 _____
948 _____
949 _____
950 _____
951 _____
952 _____
953 _____
954 _____
955 _____
956 _____
957 _____
958 _____
959 _____
960 _____
961 _____
962 _____
963 _____
964 _____
965 _____
966 _____
967 _____
968 _____
969 _____
970 _____
971 _____
972 _____
973 _____
974 _____
975 _____
976 _____
977 _____
978 _____
979 _____
980 _____
981 _____
982 _____
983 _____
984 _____
985 _____
986 _____
987 _____
988 _____
989 _____
990 _____
991 _____
992 _____
993 _____
994 _____
995 _____
996 _____
997 _____
998 _____
999 _____
1000 _____
1001 _____
1002 _____
1003 _____
1004 _____
1005 _____
1006 _____
1007 _____
1008 _____
1009 _____
1010 _____
1011 _____
1012 _____
1013 _____
1014 _____
1015 _____
1016 _____
1017 _____
1018 _____
1019 _____
1020 _____
1021 _____
1022 _____
1023 _____
1024 _____
1025 _____
1026 _____
1027 _____
1028 _____
1029 _____
1030 _____
1031 _____
1032 _____
1033 _____
1034 _____
1035 _____
1036 _____
1037 _____
1038 _____
1039 _____
1040 _____
1041 _____
1042 _____
1043 _____
1044 _____
1045 _____
1046 _____
1047 _____
1048 _____
1049 _____
1050 _____
1051 _____
1052 _____
1053 _____
1054 _____
1055 _____
1056 _____
1057 _____
1058 _____
1059 _____
1060 _____
1061 _____
1062 _____
1063 _____
1064 _____
1065 _____
1066 _____
1067 _____
1068 _____
1069 _____
1070 _____
1071 _____
1072 _____
1073 _____
1074 _____
1075 _____
1076 _____
1077 _____
1078 _____
1079 _____
1080 _____
1081 _____
1082